

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE Subpoena Issued to)	Case No.
Birch Communications, Inc.)	1:14-mi-00110-WSD-JFK
f/k/a CBeyond Communications,)	
LLC.)	
)	
)	

CONSENT MOTION FOR ENLARGEMENT OF TIME IN WHICH RIGHTSCORP,
INC. MAY RESPOND TO CBEYOND COMMUNICATION, LLC'S
MOTION TO QUASH SUBPOENA AND FOR SANCTIONS

COMES NOW Rightscorp, Inc. ("Rightscorp"), by and through its undersigned counsel, and with the express written consent of Birch Communications, Inc. f/k/a CBeyond Communications, LLC ("CBeyond"), and moves this Honorable Court for an enlargement of time of fourteen (14) days in which to respond to CBeyond's Motion to Quash Subpoena and for Sanctions. Rightscorp shows this Court the following:

1.

On September 9, 2014, Rightscorp served a subpoena on CBeyond pursuant to 17 U.S.C. § 512(h)(2)(C) seeking certain identifying information relate to alleged copyright infringement by individuals at particular Internet Protocol (IP) addresses.

2.

In response to the 17 U.S.C. § 512(h)(2)(C) subpoena,

on Friday, October 17, 2014, CBeyond filed a Motion to Quash Subpoena and for Sanctions ("Motion") and served Rightscorp a copy of same via U.S. Mail.

3.

The original time in which Rightscorp has to respond in this Court to CBeyond's Motion is on or before Monday, November 3, 2014.

4.

Rightscorp herein seeks an enlargement of time of fourteen (14) days in which to respond to CBeyond's Motion. As evidenced by its counsel's signature below, CBeyond has consented to Rightscorp's request.

5.

Should this Court grant this Consent Motion, the new time in which Rightscorp has to respond to CBeyond's Motion to Quash Subpoena and for Sanctions would be **Monday, November 17, 2014**. A proposed Consent Order is attached hereto as Exhibit A.

6.

Rightscorp makes this request in good faith and this is the first request for an enlargement of time to respond to CBeyond's Motion to Quash Subpoena and for Sanctions.

Respectfully submitted this 29th
day of October, 2014.

s/ Michael O. Crain
Michael O. Crain, Esq.
Georgia Bar No. 193079
Counsel for Rightscorp, Inc.

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Consented to by:

s/ D. Lee Clayton
D. Lee Clayton, Esq.
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Counsel for CBeyond
Communications, LLC

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7.1 Certificate of Compliance

Pursuant to L.R. 7.1D of the Northern District of Georgia, I hereby certify that this document was prepared in Courier New, 12 point font, pursuant to L.R. 5.1(C).

This 29th day of October, 2014

s/ Michael O. Crain
Michael O. Crain, Esq.
Georgia Bar No. 193079
Counsel for Rightscorp, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2014 a copy of the above and foregoing **CONSENT MOTION FOR ENLARGEMENT OF TIME IN WHICH RIGHTSCORP, INC. MAY RESPOND TO CBEYOND COMMUNICATION, LLC'S MOTION TO QUASH SUBPOENA AND FOR SANCTIONS** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to the following attorney of record:

D. Lee Clayton, Esq.
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s/ Michael O. Crain
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